Petition: Amendment of Part 97 of the Commission's Amateur Radio Service Rules to Permit Issuance of Certain Call Signs without Requiring Resident Mailing Address

Petitioner - *Pro se*: Danny G. Jamison, Amateur Radio Operator AH6FX: I am a "pro se" Petitioner without attorney representation in this matter. Accordingly, I respectfully ask the Commission to provide special considerations to ensure I have a fair opportunity to present my Petition. While I must follow the same rules and procedures as licensed attorneys, I ask the Commission to offer some leniency in interpreting my Petition, and provide other assistance and consideration as appropriate. I respectfully ask the Commission to focus more on the substance of the Petition rather than strict adherence to form.

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Summary

Despite the call sign allowances in the Commission's call sign system, there remains a portion of our U.S. land mass which is ineligible for call sign issuance. Therefore, amending Part 97 to establish a *Special remote area limited-use call sign system* allows the assignment of certain amateur radio call signs that are set aside for certain now-uninhabited U.S. insular areas. Eliminating the licensee address *corresponding to the geographic region of the licensee's mailing address* requirement for said call sign assignment recognizes the impracticality of establishing residence on uninhabited islands, and the impracticality of the U.S. Postal Service establishing delivery to remote and uninhabited islands. Amending Part 97 thereby enables the assignment of said call signs.

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Amendment of Part 97 of the Commission's	)	Docket # - none (?)
Amateur Radio Service Rules to Permit Issuance of	)	
Certain Call Signs without Requiring Resident	)	Rule Making # - none (?)
Mailing Address	)	

To: The Chief, Wireless Telecommunications Bureau
Via: Office of the Secretary

PETITION

I, Danny G. Jamison, Amateur Radio Operator AH6FX, pursuant to Title 47, Chapter 1, Subchapter A, Part 1, Subpart C, Section 1.407 of the Commission's Rules (*47 CFR §1.407*) whereby the Commission determines this Petition discloses sufficient reasons in support of this action to justify the institution of a rulemaking proceeding, and determines a notice and public procedure thereon are not required; hereby respectfully request the Commission issue a *Final Order* amending Sections 97.3 and 97.19 of the Commission's rules as specified in the *Appendix 2* attached hereto. If unfeasible to issue a *Final Order*; then in pursuant to Section 1.401 of the Commission's Rules (*47 CFR §1.401*), I respectfully request the Commission issue a *Notice of Proposed Rule Making* proposing modification to Sections 97.3 and 97.19 of the Commission's rules as specified in the *Appendix 2* attached hereto. In this regard, request issuance of the *Notice* at the earliest date.

The changes proposed would relieve the Amateur Radio Service of an outdated restrictive requirement that practically makes impossible the assignment of certain U.S. call signs

established perhaps in a mid-20th century version of Part 97. It is impractical and unreasonable to require licensee's to have a mailing address on certain uninhabited U.S. entities[1] when conducting amateur radio operations.

This proposed rule change eliminates the requirement for assigning certain call signs based on the geographic region of the licensee's mailing address and operator class. This relates specifically to the set of Amateur Radio Service call signs identified in the table appearing at *Appendix 1*. Under Part 97 now, for example, amateur radio station K1xxx living in Maine may not be assigned a distinctive and appropriate call sign for temporary amateur radio operations on KH7K - Kure Island because mailing addresses are not available on Kure Island and K1xxx lives in Maine, but has authorization to visit Kure. Eliminating the licensee mailing address requirement for said call sign assignment recognizes the impracticality of the U.S. Postal Service establishing mail delivery to remote and uninhabited islands, et al; and allows proper call sign assignment and station identification in accordance with *§97.119 Station identification*.

I propose amendments to Section 97.3 and Section 97.19 of the rules, authorizing assignment and issuance of amateur radio call signs without the requirement for a mailing address on various uninhabited entities, as is now the case. Additionally supporting this action, I propose a corresponding modification to the call sign structure.

In support of my Petition, I state as follows:

I. **Introduction**.

[1] See Appendix 1 to Part 97—Places Where the Amateur Service is Regulated by the FCC

1. In accordance with 47 CFR Part 97, the Commission manages the Amateur Radio Service's system of call signs and assigns generally three types of call signs based on certain specified criteria. Club stations are not addressed.
    a. The general call sign structure[2] used in everyday amateur radio communication is addressed in CFR §97.3 Definitions (a)(11)(i). It establishes and defines the *Sequential Call Sign System.* Further, it establishes the assignment of call signs by the Commission from an alphabetized list corresponding to the geographic region of the licensee's mailing address and operator class.
        i. The *Sequential Call Sign System* is managed very well and only one point is concerning.
            1. The licensee's *mailing address* criteria is an obstacle and object of this Petition, and discussed below. But the sequential call sign issuance per se is not contentious.
    b. The *Vanity Call Sign System* per CFR §97.3 Definitions (a)(11)(ii) and an FCC webpage[3] describes the issuance process. A minor Vanity call amendment is proposed below.
    c. An object of this Petition relates to the *Special Event Call Sign System* defined in CFR §97.3 Definitions (a)(11)(iii) and described at an FCC webpage[4]. "When transmitting in conjunction with an event of special

[2] https://www.fcc.gov/wireless/bureau-divisions/mobility-division/amateur-radio-service/amateur-call-sign-systems
[3] Ibid.
[4] Ibid.

significance, an amateur station ("special event station") may transmit the identification announcement using a special event call sign in accord with the procedures ... Substituting a special event call sign for its assigned call sign may help a special event station call attention "on-air" to its participation in the special event and to the unique opportunity for the amateur service community to exchange greetings with the station. Use of these provisions, however, must not detract from the station *making the source of its transmissions known* to those receiving them."[5]

2. Standard call signs used during normal ham radio operations are not problematic. The problem relates to Part 97 restricting the FCC from issuing distinctive call signs for amateur radio operations in *uninhabited* Pacific and Caribbean insular or isolated atolls, islands, or areas (see table at *Appendix 1*); where visiting amateur radio operators are unable to obtain mailing addresses because of the lack of U.S. post offices or U.S. Postal Service deliveries; or the infeasibility of establishing residence therein.

3. Despite the call sign allowances in the Commission's call sign system, there remains a portion of our U.S. land mass which is ineligible for call sign issuance. At the *Appendix 2* attached hereto, I will propose to reestablish amateur radio call sign issuance for amateur radio operations in the Caribbean Insular and Pacific insular areas.

[5] Ibid.

II. Background.

1. During much of the 20th century and before, several of the now-uninhabited U.S. islands in the Pacific and Caribbean were occupied by various elements of U.S. governmental agencies such as the Coast Guard and various military services, NOAA, weather stations, et al. Some islands were privately owned[6]. Several island occupants were ham radio operators and their call signs properly reflected their remote island locations. The table at *Appendix 1* lays out today's call sign schema and identifies uninhabited areas by call sign prefix; which are the object of this Petition.

2. But today many of those remote islands[7] are unoccupied. No one can obtain an address on Jarvis Island, as an example, much less is there U.S. postal service to the island. Therefore a call sign having the unique "KH5" prefix for Jarvis can not be assigned. Instead, in 2024 the Commission assigned the *Special Event Call Sign* "N5J" which is very misleading because "5 area" call signs are assigned for amateurs with mailing addressing in the American southwest, more or less.

    a. In the same regard, "K1N" was issued for a 2015 amateur radio operation to Navassa Island; but the call sign prefix indicates a station located in the

[6] Note: Today, most of Palmyra Atoll is privately owned by The Nature Conservancy. Although they own nearly all of the land, the National Wildlife Refuge therein is administered by the U.S. Fish and Wildlife Services. Amateur radio operations have taken place there in the recent past. There is no U.S. postal service to Palmyra. The few Nature Conservancy or USFWS personnel who rotate in-and-out of the atoll have infrequent mail delivery which is often coordinated with supply runs or research expeditions, but Palmyra is not served by the U.S. Postal System. Most mail exchange is likely via the internet.

[7] Note: Certain insular areas require special use permits from the U.S. Fish and Wildlife Services, the State of Hawaii, or the U.S. military. Except for Midway and Wake Islands, these islands are unoccupied except for various short term scientific research visits. All recent amateur radio operations therein received proper credentialing.

New England portion of the U.S. Similarly, a 2009 amateur radio operation to Desecheo Island was issued "K5D," likely confusing some amateurs believing the location was someplace in the U.S. southwest.

b. Those amateur radio operations cited above for N5J, K1N, K5D, and others involuntarily and unwittingly violated provisions of the *Special Event Call Sign System* established above[8] requiring "Use of these provisions, however, *must not detract from the station making the source of its transmissions known to those receiving them*." "Source of transmissions" should indicate geographic location, among other things. Commission-assigned call signs indicated those stations were operating from the American southwest and New England. In reality, they were in Pacific and Caribbean insular areas.

c. However, a 2018 amateur radio team to Baker Island used the call sign KH1/KH7Z. The amateurs chose that distinctive call sign to properly identify their location on that rare Pacific island. This represented an authorized call sign variation showing the Hawaiian amateur (KH7Z) duly conducting radio operations on Baker Island (KH1). Therefore, a Commission assignment of a special call sign was not required.

    i. Additionally, the problem also relates to ergonomics. That KH1 amateur radio operation contacted about 70,000 amateurs worldwide over the course of several weeks. The team of radio operators on Baker quickly experienced stress, fatigue, and awkwardness when

[8] CFR §97.3 Definitions (a)(11)(iii)

repeatedly transmitting their extraordinarily long, multi-character station identification using voice, Morse code, and various digital modes. Nevertheless, that sort of ergonomic experience is expected on these types of amateur radio operations; but a desirable standard KH1 call sign, in this case, requires transmitting only four or five characters instead of the eight required for the KH1/KH7Z operation.

1. The use of KH1/KH7Z is a compromise. Usage of a KH1 call sign would be the logical solution.

3. Despite their remoteness and uninhabited conditions, amateur radio activities to these U.S. entities are on the increase, especially after COVID. Amateurs conduct privately financed "DXpeditions" which are a special class of ham radio operations, often costing several hundreds-of-thousands of U.S. dollars. A DXpedition is an amateur radio operation to what is considered an exotic place by amateurs, perhaps because of its remoteness, access restrictions, or simply because there are very few radio amateurs active from that place. The demand for call sign issuance to these U.S. insular areas will increase, and at least one is now in the planning stage. It makes good common sense to remove the mailing address requirement for call sign assignment. It is not reasonable to require a mailing address for activities on remote uninhabited islands.
4. I request the Commission modify Section 97.3 and Section 97.19 to delete all mailing address requirements for amateur radio operations from Pacific and Caribbean insular areas. Further, request the Commission to modify its webpage to reflect amendments contain in the Petition.

III. **Justification for amending mailing address requirements for amateur radio operations from certain Pacific and Caribbean insular areas.**

1. It makes good common sense to remove the mailing address requirement for certain areas when assigning certain call signs. It is not practical to require a mailing address when assigning amateur radio call signs for activities on remote uninhabited islands.
2. It is doubtful the U.S. Postal Service will establish mail delivery to uninhabited islands. Further, it is doubtful U.S. persons will establish residence thereon; except for the U.S. military which is now the case for Midway and Wake Islands, and perhaps Johnston Atoll.
3. Therefore, Part 97 of the Commission's Rules no longer reflects the current population and habitation patterns of U.S. insular islands. It prohibits and inhibits radio amateurs from properly and easily identifying their transmitting locations.
4. It is clearly in the best interests of all radio amateurs worldwide for the Commission to overcome this outdated regulation.

IV. **How the interests of the Petitioner will be affected.**

1. The proposed changes would allow the assignment of certain amateur radio call signs that are set aside for certain now-uninhabited[9] U.S. insular areas.
2. Eliminating the licensee mailing address requirement for said call sign assignment recognizes the impracticality of the U.S. Postal Service establishing delivery to remote and uninhabited islands, et al.

[9] Note: Midway, Wake, and Palmyra may be occupied by U.S. Government members and others, but are included in the *Special remote area limited-use call sign system* because of their remoteness, rarity, and limited amateur radio operations therein; combined with no USPS delivery.

3. This change establishes and permits a *Special remote area limited-use call sign system* for managing U.S. amateur radio operations originating from geographically remote U.S. entities. Such operations provide unique opportunities for amateur radio operators temporarily located in these remote areas to exchange communications with hundreds of thousands of amateur radio stations worldwide.
4. This change establishes various definitions supporting the *Special remote area limited-use call sign system*, and makes minor administrative changes. These amendments update and promote clarity in Part 97.

Respectfully submitted,

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(my facsimile signature)

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APPENDIX 1

Table: Current U.S call sign schema and identification of uninhabited areas by amateur radio prefix.

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Call Sign Prefix	Entity	Geography	Uninhabited	Mailing Address Availability
K,W,N,AA-AK	United States of America	United States of America		
KG4	Guantanamo Bay	North America	Military	No USPS
KH0	Mariana Islands	Oceania		
KH1	Baker & Howland Island	Oceania	Yes	No
KH2	Guam	Oceania		
KH3	Johnston Island	Oceania	Yes	No
KH4	Midway Island	Oceania	Military	No USPS
KH5	Palmyra & Jarvis Island	Oceania	Yes, part time	No USPS
KH5K	Kingman Reef	Oceania	Yes	No
KH6, 7	Hawaii	Oceania		
KH7K	Kure Island	Oceania	Yes	No
KH8	American Samoa	Oceania		
KH8	Swains Island	Oceania	Sporadically	No
KH9	Wake	Oceania	Military	No USPS
KL, AL, NL, WL	Alaska	North America		
KP1	Navassa Island	North America	Yes	No
KP2	Virgin Island	North America		
KP3, 4	Puerto Rico	North America		
KP5	Desecheo Island	North America	Yes	No

Key: USPS … United States Postal System

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APPENDIX 2

Part 97, Subpart D of the Amateur Service Rules is amended at Sections 97.3 establishing a ***new category of call signs***, adding definitions, and amending 97.19, as indicated below:

§ 97.3 - Definitions.

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(11) *Call sign system.* The method used to select a call sign for amateur station over-the-air identification purposes. The call sign systems are:

(i) *Special event call sign system.* No change – text eliminated for brevity.

(iv) *Special remote area limited-use call sign system.* The call sign is selected by the station licensee from a list of call signs shown in a common data base coordinated, maintained, and disseminated by amateur station special event call sign data base coordinators. The call sign must have the prefix KG4, KH1, KH3, KH4, KH5, KH5K, KH7K, KH8 (less the American Samoa main island; but including seven remote islands), KH9, KP1, or KP5 as appropriate for amateur radio operators having transmitters and transmitting antennas located in the respective Pacific and Caribbean insular areas. Call sign suffix is by a single letter or multiple letters as coordinated between the licensee and call sign data base coordinator (for example KH7KA for amateur operations on Kure Island).

a. Additional *Special remote area limited-use call sign* prefixes may be established according to international and U.S. radio frequency allocation, changes, or reestablishment; and assigned based on an area's remoteness, access restrictions, lack of radio amateurs active from that entity, or other criteria supporting Part 97. Such call sign

reestablishment is not restricted and may include future call sign designations, for instance, KZ5 previously issued for the Canal Zone; or the French Frigate Shoals using the previously issued prefix KH6F, for example. In this case, past or existing Hawaiian call signs having "KH6F" portions do not require modification.

b. Licensees are exempt from having a mailing address and residency corresponding to said island, atoll, insular area, uninhabited area, or area where establishing residence and receiving U.S. Postal Service is impractical.

c. Mail delivery to Midway and Wake Islands is mostly by way of Army or Fleet post offices having zip codes in Hawaii or elsewhere. In this regard; amateur radio operators operating from Midway and Wake Islands may be assigned respective call signs for KH4 and KH9, and not KH6 or KH7 prefixes. Although Palmyra is sometimes occupied by members of The Nature Conservancy and employees of the U.S. Fish and Wildlife Services, it is impractical and infeasible to require residence and mailing addresses; therefore, amateurs should be assigned KH5 call signs accordingly.

d. Remotely controlled amateur stations are permitted wherein transmitters and transmitting antennas are established in said insular area; and the control operator indirectly manipulates the operating adjustments in the station through a control link.

e. *Special remote area limited-use call sign* is valid for 30 days, and is renewable for immediate and continued use. Issuance and renewal is through amateur station special event call sign data base coordinators as specified in §97.3 (a)(11)(iii).

f. Reciprocal operating arrangements authorized by 47 CFR §97.107 apply to *Special remote area limited-use call sign system assignment.*

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§ 97.3 - Definitions.

(27) ***In-law***. No change – text eliminated for brevity

(28) ***Insular areas***[10].

(i) In ITU[11] Region 2 – Caribbean Insular areas: Commonwealth of Puerto Rico, U.S Virgin Islands (50 islets and cays), and Navassa Island.

(ii) In ITU Region 2 – Pacific Insular areas: Johnston Island (Islets East, Johnston, North, and Sand), and Midway Island (Islets Eastern and Sand).

(iii) In ITU Region 3 – Pacific Insular areas: American Samoa (seven islands), Baker Island, Commonwealth of Northern Mariana Islands, Guam Island, Howland Island, Jarvis Island, Kingman Reef, Palmyra Island (more than 50 islets), and Wake Island (Islets Peale, Wake, and Wilkes).

~~(28)~~ (29) ***International Morse code.*** This and subsequent subparagraphs are renumbered.

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[10] Per Appendix 1 to Part 97—Places Where the Amateur Service is Regulated by the FCC
[11] International Telecommunication Union, a United Nations specialized agency for information and communication technologies.

Part 97, Subpart D of the Amateur Service Rules is amended at Section 97.19 restricting Special remote area limited-use call sign assignment as a Vanity call sign, as indicated below:

§ 97.19 - Application for a vanity call sign.

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§ 97.19 Application for a vanity call sign

(d)(4) A call sign designated under the sequential call sign system for Alaska, Hawaii, Caribbean Insular Areas, and Pacific Insular areas … of the former holder now deceased.

(a) Vanity call signs may not be issued for stations using temporary call signs assigned under the *Special remote area limited-use call sign system.*

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